

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Bryan A Reo,

Plaintiff,

– vs –

Ludivine Joan Claudia
Reynaud,

Defendant.

Case No.: 1:22-cv-00510

Judge: James Gwin

Reply in Support of Motion for an
Additional Forty-Eight Hours in Which to
Response to the Pending Motions filed by
the Plaintiff

Defendant Ludivine Joan Claudia Reynaud, by and through her undersigned counsel, has filed a Motion (ECF No. 40) for an additional forty-eight (48) hours, through and until 5:00 p.m. on Thursday, September 8, 2022, in which to file Responses in Opposition to the several Motions lately filed by the Plaintiff. That motion was filed Sunday, September 4, 2022 at 11:30 p.m.

The Plaintiff has not opposed the Motion, but in a Response (ECCF No. 41) has asserted that undersigned counsel misrepresented to the Court that the Plaintiff was conducting a deposition yesterday. Counsel represents that in a series of email communications last week, the question of whether that deposition was going forward was on–again–off–again, and that the undersigned in good faith believed it was going forward. He maintained it on his calendar and contacted the Plaintiff at 7:45 a.m. on Labor Day, fifteen minutes before the deposition had been scheduled to begin, to ask to be resent the video log in credentials.

The undersigned continues to suffer from his injuries. His ability to walk, sit and stand is if anything worse. He cannot sleep but briefly and fitfully. He has delayed seeking medical treatment so as not to take away from the time spent on this case, pending an extension. He is unable to meet the deadline and cannot properly represent his client absent an extension.

Defendant respectfully seeks the requested extension to permit counsel time to see a physician, and to permit an orderly Response to the pending motions. Counsel has asked for the most modest extension commensurate with completing these tasks and will of necessity be postponing a deposition in another matter to complete them in the time requested.

In the alternative, counsel respectfully requests that the Court extend through the end of the day on Thursday, September 8, 2022, the period in which to file a Response in Opposition to ECF No. 33 only, which both in length and purpose is more akin to a dispositive motion than a mere discovery motion and requires a substantial response.

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

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Attorneys for Defendant

Ludivine Joan Claudia Reynaud

— CERTIFICATE OF SERVICE —

The foregoing was filed today, Tuesday, September 6, 2022, via the Court's Electronic Filing System. Service will be made upon represented parties and copies may be obtained through operation of the CM | ECF System.

Respectfully submitted,

/s/ Raymond V. Vasvari, Jr.

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